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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re Applications of)
DEAS COMMUNICATIONS, INC.)
HEALDSBURG BROADCASTING, INC.)
HEALDSBURG EMPIRE CORPORATION)
For Construction Permit for a)
New FM Station on Channel 240A)
in Healdsburg, California)

MM DOCKET NO. 92-111

File No. BPH-910208MB

File No. BPH-910211MB

File No. BPH-910212MB

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To: Acting Chief Administrative Law Judge
Walter C. Miller

SUPPLEMENT TO JOINT REQUEST FOR APPROVAL
OF AGREEMENT, DISMISSAL OF APPLICATION AND
MERGER OF APPLICANTS

Deas Communications, Inc. ("Deas"), by its attorneys,
hereby supplements the Joint Request for Approval of Agreement,
Dismissal of Application and Merger of Applicants, filed
December 28, 1992, with the annexed Certification of
undersigned Deas counsel pursuant to Section 73.3525(a)(5) of
the Commission's Rules.

In support whereof, the following is shown.

This Supplement results from a conversation between
the undersigned and counsel for the Mass Media Bureau on
January 5, 1993. In that conversation Bureau counsel noted
that the aforementioned Joint Request does not include "an
itemized accounting of the expenses for which [Deas] seeks
reimbursement," per Rule 73.3525(a)(5).

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Although it was pointed out that under the circumstances of the instant merger, as described in the Joint Request, Deas is not seeking reimbursement for expenses and, indeed, will be in the unusual position of receiving compensation from Healdsburg Broadcasting, Inc., which will dismiss its application in return for a nonvoting equity position in Deas, Bureau counsel maintained that such an itemization is nonetheless called for. The annexed Certification, which conforms with the Rule, is therefore being provided.

WHEREFORE, for these reasons, this Supplement should be accepted and the Certification associated with the pending Joint Request.

Respectfully submitted,

DEAS COMMUNICATIONS, INC.

By: 
Lawrence Bernstein

Its Attorney

BRINIG AND BERNSTEIN
1818 N Street, NW, Suite 200
Washington, D.C. 20036
(202) 331-7050

Attachment

January 6, 1993

CERTIFICATION

I, Lawrence Bernstein, declare under penalty of perjury that the following statement is true and correct.

I am communications counsel to Deas Communications, Inc. ("Deas"), an applicant before the Federal Communications Commission for a new FM radio station in Healdsburg, California in MM Docket No. 92-111. This Certification is being submitted in connection with a Joint Request for Approval of Agreement, Dismissal of Application and Merger of Applicants, filed December 28, 1992, and is intended to comply with Section 73.3525(a)(5) of the Commission's Rules.


My firm, Brinig and Bernstein, has represented Deas since just after the Healdsburg proceeding was designated for comparative hearing by the Commission. Deas had other communications counsel prior to designation.

On June 1, 1992, we filed a Notice of Appearance on behalf of Deas. Since that time, and as is reflected in the Commission's docket files, we have filed a large number of pleadings in this proceeding, including, but not limited to: a Standardized Integration Statement, oppositions to petitions to enlarge issues, motions to compel document production, an opposition to an appeal, an Application for Review, and direct case exhibits. We also drafted proposed findings of fact and conclusions of law for Deas prior to the time when, due to an action of the FCC's Review Board, the proceeding was reopened.

Additionally, we have participated in numerous discussions with other counsel in the proceeding, relating both to settlement and other matters. We actively negotiated a proposed merger with another applicant in the case and prepared many of the settlement papers and pleadings relating to the pending settlement, which are now on file.

I certify under penalty of perjury that the legal fees and expenses charged thus far by my firm to Deas for such representation exceed \$40,000.00.

Respectfully submitted,



Lawrence Bernstein

January 6, 1992

CERTIFICATE OF SERVICE

I hereby certify that I have, this 6th day of January, 1993, served copies of the foregoing "Supplement to Joint Request for Approval of Agreement, Dismissal of Application and Merger of Applicants" upon the following persons by first class United States Mail, postage prepaid:

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